

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of
MB Docket No. 04-233

Comments of
Bruce N Quinn

Background

I may be one of the few Americans who has some experience on both sides of many issues in this FCC proceeding. Once, locked out of broadcasting. Then, a radio station owner for 20 years.

Thirty years ago, the FCC had rules in place that prohibited a legally blind man from being the operator on duty of a broadcast station. Despite passing the test, I was not able to work in my chosen field because of FCC restrictions. My dream of owning my own station one day would have been crushed except for a few things.

As a determined young man I defied the Federal Communications Commission and built a pirate radio station called Jolly Roger Radio. The unlicensed station operated on AM, FM, and short wave. And it stayed on the air until the FCC Field Office in Chicago came to shut it down. It was then that I got my chance to tell the people of this country about how I had been shut out of broadcasting because of my handicap. This story made national news many times in print and television.

Now, this might really have been my end, but, Senator Edward Kennedy intervened and told the FCC that I should have a license. The Engineer In Charge of the Chicago Field Office was a man who had once been a consultant. He took a liking to me and showed me how to prepare FCC applications. Then the chief of the Allocations Branch let me hang out at the building on M Street and see how the FCC worked. They showed me how to find new channels and file petitions for rulemaking.

The FCC was now quite aware of who I was and in the late 1980s gave me 3 FM construction permits. Two were for small towns and one was 10 miles from downtown Indianapolis. With financial help from my family, I built and licensed these radio stations almost 20 years ago.

Almost all the other small stations around went broke. But I survived by doing community events. Lots of community events and I found sponsors for that.

I found radio frequencies for many others and helped them file applications and start FM radio stations including Indiana University.

The Problem

It's true! Broadcasting is really a mess right now. More than ever it has become a rich man's game. Women, minorities, and even average Americans don't have the millions of dollars that licenses are selling for today. Many in small towns and inner cities have no station that cares about them. Music is no longer selected on a local level. Stations in corporate clusters are unmanned and tornado warnings don't get on the air at night.

The 107,000 Comments

The FCC has been swamped with about 2 form letters by 2 groups, filed many times. One seeks to break up the clusters, send them back to their community of license, have community boards form and dictate programming. Have someone on duty at all times.

The second form letter from religious broadcasters sees this proceeding as a war against Christian radio. People who dislike their religion could form hostile citizens boards and stop their freedom of speech and censor programming.

Discussion And Solutions

I believe the Commission should open more frequencies to give more Americans the chance to become station owners. Open LPFM filing windows and remove The 3rd adjacent channel restriction. Also, take the 12 Mhz of Television Channels 5 & 6 and expand the FM band.. Make 6 Mhz non-commercial and 6 Mhz commercial for new owners and minorities.

I applaud the community radio stations that operate with citizen volunteers. They bring a unique form of radio that every city should enjoy. But we should not force this style of radio on others with programming advisory boards. Instead require all stations to do some public service in their community of license and document it in their public file.

Radio stations should have someone on duty. Technology is wonderful today. However, when a computer goes crazy, only a human being can fix it. Someone needs to get that tornado warning on too. I don't care if the operator

is at a remote location, or asleep as long as alarms wake him and he can grab a microphone.

It is too late to send broadcasters back to their community of license. The advertising base that supported these stations may have vanished, or other stations may have moved in. Most broadcasters are struggling today. Super stores rarely advertise. And they have put out of business those who did. Some of these proposals would now ruin broadcasters in medium sized towns.

But, there are still those who would be happy to own a station in a small town.

Those who work hard can survive. Minorities in large cities need service.

Let's pass some new rules and get more radio stations and new owners on the air.